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Benjamin S. Kaminetzky

Davis Polk & Wardwell LLP 212 450 4259 tel
450 Lexington Avenue ben.kaminetzky@davispolk.com
New York, NY 10017

April 2, 2021

Re: *Peterson v. Islamic Republic of Iran*, No. 13-cv-9195 (LAP)

VIA ECF

The Honorable Loretta A. Preska
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2220
New York, New York 1007

Dear Judge Preska:

We write on behalf of Clearstream Banking S.A. (“Clearstream”), a defendant in the above-referenced litigation, to provide the Court with an update on certain litigation pending before the Luxembourg Courts.

In letters to the Court dated November 25, 2020 (ECF No. 294) and December 2, 2020 (ECF No. 295), Clearstream advised that (1) through a declaratory action commenced by Bank Markazi against Clearstream in Luxembourg in March 2020, Bank Markazi seeks a declaration that Clearstream cannot comply with a U.S. court order in this case that directs Clearstream to transfer the right to payment at issue to the United States in reliance on 22 U.S.C. § 8772 without first obtaining recognition of such court order in Luxembourg; (2) a Luxembourg appellate court entered a decision and order on November 25, 2020 that temporarily prohibits Clearstream from transferring the right to payment at issue here to the United States until the Luxembourg District Court renders a decision with respect to Bank Markazi’s declaratory action; (3) the Luxembourg District Court was scheduled to conduct a merits hearing in Bank Markazi’s declaratory action, which occurred on January 27, 2021; and (4) it was likely that the Luxembourg District Court would render its decision on the merits of the declaratory action in late February or March 2021.

Earlier today, April 2, 2021, the Luxembourg District Court informed the parties that it has postponed rendering its decision with respect to Bank Markazi’s March 2020 declaratory action until April 30, 2021.

Respectfully submitted,

/s/ Benjamin S. Kaminetzky

Benjamin S. Kaminetzky

cc: All Counsel of Record (via ECF)